

EXHIBIT 34

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SWISSDIGITAL USA CO., LTD.

Plaintiff,

v.

SAMSONITE INTERNATIONAL S.A.;
SAMSONITE LLC; SAMSONITE
COMPANY STORES, LLC; and
DIRECT MARKETING VENTURES,
LLC;

Defendants.

Case No. 1:24-cv-11636-JEK

JURY TRIAL DEMANDED

**PLAINTIFF SWISSDIGITAL USA CO., LTD.'S SECOND SUPPLEMENTAL
RESPONSES AND OBJECTIONS TO DEFENDANTS' INTERROGATORIES**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff Swissdigital USA Co., Ltd. ("Plaintiff" or "Swissdigital") for its second supplemental response to Defendants Samsonite International S.A. ("Samsonite Int'l"), Samsonite LLC ("Samsonite LLC"), Samsonite Company Stores, LLC ("Samsonite Co. Stores"), and Direct Marketing Ventures, LLC ("DMV") (collectively, "Defendants") Interrogatories herein, alleges upon information and/or knowledge and/or belief:

RESERVATION OF RIGHTS

Plaintiff reserves all objections to the admissibility of any information produced in response to the Interrogatories. Inadvertent disclosure of any information shall not be a waiver of any claim of privilege, work-product protection, or any other exemption.

11. Plaintiff's responses are based upon information and writings presently available to and located by Plaintiff and its attorney. Plaintiff reserves its right to supplement or modify its responses to the Interrogatories at any time up to and including the time of trial.

12. The objections set forth above are incorporated in each response below and shall be deemed to be continuing although not specifically referred to in each response.

INTERROGATORIES

INTERROGATORY NO. 1:

For each Related Product, identify: (1) the product, associated components, and accessories by model number, SKU, trade name, part number, serial number, internal code name, project name, and any other known designation or identifier, (2) the dates the product was sold, (3) from 2018-06-25 through 2024-06-25 the sales and cost information for the product, including the sales price, units sold, gross revenue, profits, and cost to Swissdigital of the product itself, exclusive of any overhead or shipping, whether the product is purchased by Swissdigital from a manufacturer (in which case this would be Swissdigital's purchase price per unit) or manufactured by Swissdigital (in which case this would be the cost-per-unit to manufacture). Your response shall further identify all Documents, Things, and witnesses on which You rely or which otherwise relate to Your response, including those that rebut Your response, and shall identify the Persons most knowledgeable regarding the factual bases for Your response, and a description of each such Person's knowledge.

OBJECTIONS/RESPONSE (*served 12/2/24*): Plaintiff objects to this interrogatory to the extent that it is vague and non-specific. Plaintiff also objects to the extent that this interrogatory is overly broad and burdensome and not proportional to the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties' relative access to relevant

information, the parties' resources, the importance of the discovery in resolving the issues, and whether the burden or expense of the proposed discovery outweighs its likely benefit. Plaintiff objects to this interrogatory because it contains multiple interrogatories. Plaintiff will count each of these separate interrogatories for purposes of determining the limit of interrogatories allowed by Defendant. Plaintiff objects to the extent that this interrogatory seeks information protected by the attorney-client privilege or work product privilege. Plaintiff objects to the extent that information responsive to this interrogatory may be more appropriately obtained through other means, such as deposition testimony.

Notwithstanding and subject to the General Objections and foregoing specific objections, Zhijian "Hunter" Li is the Person most knowledgeable of the topics contained in this interrogatory. Pursuant to Federal Rule of Civil Procedure 33(d), Swissdigital identifies at least the following Bates numbered documents as responsive to this interrogatory: SWISSDIGITAL001887. Discovery in the case is ongoing, and Swissdigital continues to investigate and will supplement its response to this interrogatory if necessary.

SUPPLEMENTAL RESPONSE (*served 2/21/25*): Notwithstanding and subject to the General Objections and foregoing specific objections, Swissdigital supplements its response to this interrogatory as follows. Pursuant to Federal Rule of Civil Procedure 33(d), Swissdigital identifies at least the following Bates numbered documents as responsive to this interrogatory: SWISSDIGITAL001888.

SWISSDIGITAL001888 shows sales through D&H Distributing Co. as "DH" in column B. D&H Distributing Co. distributes Swissdigital's products through the following sales channels: Best Buy Purchasing LLC; Fred Meyer Inc.; Office Depot.com; Staples Advantage; B & H Photo and Electronics Corp.; Inmotion Entertainment Group L.; Nebraska Furniture Mart; Lenovo

(United States) Inc.; Best Buy.com; Veyer LLC; Electronic Express Inc.; CDW Logistics; Staples.com; Quill Corporation; Smart Deduct Inc.; Barnes & Noble College Booksel.; Columbus State CC Bookstore; Walmart.com; Datavision Computer Video Inc.; Beach Trading Co., Inc.; Insight; Magnell Associate Inc.; Provantage LLC; D&H Promo Account; Schoeneckers Inc.; IQVC; Carltonone Engagement Corp.; College of Southern Maryland; Northpoint - Mainmicro Technol.; Abt Electronics Inc.; The PC Place II Inc.; Newegg Inc.; Amazon.com Services LLC; Nitouch Business Services Stap; De Lage Landen - GHA Technol.; Caldwell Community College; Beach Trading Co., Inc.; Tiger Tech; UCSD Bookstore; PC Connection Inc.; Pacific Northwest Business Pro; Southeast Tech Bookstore; Associated Students UCLA; Beach Audio; Stratus Inc.; Utah Valley University; The University Store of Fifth; Amazon.com Inc.; Larry's Lock & Safe Service In.; Fayetteville Technical CC Book; Unbeatablesale Inc.; Rams Bookstore; IT1source LLC; Antonline.com; Computer Corner Inc.; Cyberstorm LLC; Hied Inc.; Discount Office Items Inc.; Southern Cresent Technical Co.; Digital Den at Rit.; Vantage Point Corp.; Wesleyan University; ASI Networks Inc.; College of Lake County Booksto.; Skyline College Bookstore; Discover Group Inc.; SHI International Corp.; Univ. of CA/Merced; Johnson County Cmty. Coll.; Howard Industries; College of San Mateo Bkst.; University of San Diego Bookst.; Can-Am Wireless LLC; Southeast Community College; Pittsburgh Technical Institute; Best Buy for Business; Teleasy Corporation; Thinkedu LLC; University of Minnesota-Duluth; USC Computer Store; LSU School of Medicine Books.; Tecisoft Corp.; Cavalier Computers; Lenovo (United States) In.; Marketnation Inc.; Alcala's Accessories; Canada College Bookstore; Orangeburg-Calhoun Tech Coll.; Amarillo College Bookstore; GE Capital - HCGI Hartford Inc.; Spacebound Inc.; Wired at Home LLC; Discount Dynamics LLC; DLL - Clutch Solutions LLC; Novatech Inc.; UR Tech Store University of Ro.; Compsource, Inc.; Tasco Auto Color Corp.; FIU Panther Tech;

Rochester Institute of Technol.; Jet Micro Corporation; B&N.com; A-hi Computers & Electronics; Pacific Northwest Busines.; Educ Show Account; Northeast Texas Comm. Coll.; Silicon Valley Commerce LLC; Linear Supplies LLC; Nobletec LLC; Employee Sales - Corporate; Barnes & Noble College Bo.; Paragon Micro Inc.; The Bookstore - Boise State; Follett Heg-Retail Svcs.com; Black Diamond Technologies Inc.; Frederick Community College Bo.; Jojo's Island Imports LLC; Texas Book Co.; Compuworld Inc.; Webclimber Services; Gaston College Bookstore; and Univ. of Dayton Computer Store.

Discovery in the case is ongoing, and Swissdigital continues to investigate and will supplement its response to this interrogatory if necessary.

SUPPLEMENTAL RESPONSE: Notwithstanding and subject to the General Objections and foregoing specific objections, Swissdigital supplements its response to this interrogatory as follows. Pursuant to Federal Rule of Civil Procedure 33(d), Swissdigital identifies at least the following Bates numbered documents as responsive to this interrogatory: SWISSDIGITAL001889.

INTERROGATORY NO. 2:

For each USB component in any Swissdigital product, identify: (1) the Entity from which the component was purchased, (2) the model number, SKU, trade name, part number, serial number, internal code name, project name, and any other known designation or identifier, (3) the dates the component was used, and (4) the cost information for the component, including the purchase price, list price, quantity purchased, shipping costs, rebates, and discounts. Your response shall further identify all Documents, Things, and witnesses on which You rely or which otherwise relate to Your response, including those that rebut Your response, and shall identify the